IN THE UNITED STATES BANKRUPTCY COURTAGE 17 AM 8: 58 FOR THE DISTRICT OF PUERTO RICO

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IN RE:	CASE NO DBOO- (1) (2) 4 (3) (2)
ERICK R. RENTAS SANTIAGO and his wife, RAQUEL M. TORRES RODRIGUEZ D/B/A LA SABROSA BAKERY	
Debtor	CHAPTER 11

APPLICATION FOR APPROVAL OF EMPLOYMENT OF ATTORNEY

TO THE HONORABLE COURT:

NOW COMES the Debtor herein, Erick R. Rentas Santiago and his wife, Raquel

M. Torres Rodríguez d/b/a La Sabrosa Bakery, and very respectfully represents:

AUG 1 7 2000

1. On ______th, 2000 Debtor in this case filed a petition herein under Chapter 11 of the Bankruptcy Code.

- 2. Your applicant has continued in possession of its property, and your applicant as Debtor in Possession has been operating its business and managing its property.
- 3. Debtor as Debtor in Possession wishes to employ MR. MODESTO BIGAS MENDEZ, an attorney duly admitted to practice before this Honorable Bankruptcy Court and before the Courts of the Commonwealth of Puerto Rico.



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- 4. Your applicant believes that Mr. Bigas Méndez has the required experience in the matters that the Debtor has engaged him and is qualified to continue to represent the Debtor in the instant case.
- 5. The professional services that Mr. Bigas Méndez has rendered or will render in relation to this case are as follows:
- a. Give the Debtor legal advice with respect to its powers and duties as Debtor in Possession in the continued operation of its business and the management of the assets of the estate.
- b. To assist and advice the Debtor in the preparation of the required petition for relief, lists and required schedules, statements and required exhibits to complete the filing requirements of this bankruptcy case.
- c. To prepare on behalf of the Debtor all necessary applications, motions, answer to motions and replies; reports, and other legal documents related to the proceedings before this Honorable Bankruptcy Court.
- d. To represent your applicant in all legal matters pending before the Commonwealth of Puerto Rico Courts on the date the case was filed and to file and pursue on behalf of the Debtor legal actions filed against the Debtor or on behalf of the interest of the Debtor and the estate which may be filed in the Commonwealth of Puerto Rico Courts.

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- e. To perform all legal services for the Debtor as Debtor in Possession which may be necessary to the effective prosecution and administration of the case.
- 6. Mr. Modesto Bigas Méndez has no connections with the debtor, except the representation of him in this case. To the best of the applicant's knowledge, Mr. Bigas Méndez has no connections with any of the creditors of the applicant, any other party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee.
- 7. The terms of the employment of Mr. Bigas Méndez agreed to by the Debtor, subject to the approval of this Honorable Bankruptcy Court, are that the attorney will undertake or continue the representation of the Debtor at the current rates acceptable to the Honorable Court for similar services performed by qualified attorneys in similar cases.
- 8. The current hourly rate of Mr. Modesto Bigas Méndez is at the rate of \$150.00 per hour. This hourly rate is exclusive of the usual and necessary expenses to be incurred in this representation, and is subject to periodic adjustments to reflect economic and other conditions, and to reflect the increased experience and expertise in this area of the law. The attorney will make periodic applications for interim compensation, and if, at the completion of the case the results merit it, the attorney